

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:
PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11
Case No. 19-23649 (RDD) (Jointly Administered)

AFFIDAVIT AND DISCLOSURE STATEMENT OF JOHN CHARLTON GERARD LOCKEY QC

London, England

JOHN CHARLTON GERARD LOCKEY, being duly sworn, upon his oath, deposes and says as follows:

1. I am a Queen's Counsel of the Bar of England and Wales and a sole practitioner. My professional address is Essex Court Chambers 24 Lincolns Inn Fields London WC2A 3EG.
2. Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), have requested that I provide services to the Debtors, and I have consented to provide such services (the "**Services**").
3. The Services include, but are not limited to, the following: provision of English law advice and advocacy in insurance recovery arbitration in London, England.
4. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which I am to be retained.
5. Neither I, nor any principal of, or professional employed by me, has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of mine.
6. Neither I nor any principal of, or professional employed by me, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which I am to be retained.
7. As of the commencement of this chapter 11 case, the Debtors owed me \$0 in respect of prepetition services rendered to the Debtors.

8. I am conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if I should discover any facts bearing on the matters described herein, I will supplement the information contained in this Affidavit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on 2 December 2019, in London, England.



SWORN TO AND SUBSCRIBED before me this 3 day of December, 2019

Witness signature: 

Witness name: DAVID JOSEPH

Witness occupation: Barrister and Commissioner for Oaths 

Witness address:

32, Elsworthy Road
London N10 3 3DL

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YORK

In re:

PURDUE PHARMA L.P., *et al.*,

Chapter 11

Case No. 19-23649 (RDD) (Jointly Administered)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

JOHN CHARLTON GERARD LOCKEY QC of Essex Court Chambers, 24 Lincolns
Inn Fields, London WC2A 3EG

2. Date of retention: 12 October 2018

3. Type of services to be provided: Legal services

4. Brief description of services to be provided: English legal advice and representation in connection with an arbitration in London commenced by TIG/Ironshore Insurance Corp. against Purdue Pharma LP and others

5. Arrangements for compensation (hourly, contingent, etc.): Hourly rate

(a) Average hourly rate (if applicable): GBP 850

(b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition): GBP10,000.00

6. Prepetition claims against the Debtors held by the company:

Amount of claim: \$0 (fully paid up to date of petition)

7. Prepetition claims against the Debtors held individually by any member, associate, or employee of the company:

Not applicable (sole trader)

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

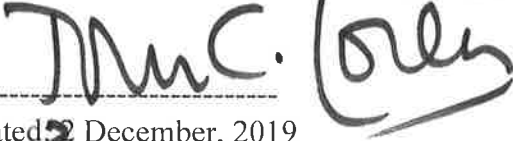
None

7. Disclose whether the professional currently represents any of the Debtors' existing shareholders, including trusts, beneficiaries, companies, affiliates, family members and any similar related parties (together, the "**Shareholder Parties**"), and/or any entity owned or controlled by any Shareholder Party (in each case other than any Debtor), and whether any Shareholder Party or any entity owned or controlled by any Shareholder Party (other than any Debtor) accounted for more than 1% of the professionals' annual revenue for any of the last five years. If so, describe what ethical walls or other protections are in place with regard to the concurrent representations.

None

8. Name and title of individual completing this form:

JOHN CHARLTON GERARD LOCKEY QC



9. Dated: 3 December, 2019